Position Justification: Remedial Project Manager (RPM)-EPR Superfund Remedial

Position, grade, series:
Environmental Engineer/Physical Scientist/Life Scientist/Chemist GS-819/1301/401/1320 – 11/12/13

Importance of Position/Alignment with Agency Goals
Superfund is a multi-media, community-centered program, so the RPM position supports all five of the Agency's strategic goals. The EPR Superfund Remedial Program (SR) manages 69 sites (NPL, NPL-equivalent, and non-NPL). SR has lost 3 senior RPMs (each with 20+ years experience) in the past several years. Their sites were simply transferred to the remaining RPMs. Region 8 has the highest proportion (28 out of 55) of any region of mega-sites–large area, technically complex, over $50M in cleanup costs. All but 4 of these mega-sites are managed by SR, and because of their complexity they require significantly more RPM LOE per site. SR RPMs also manage the Libby Asbestos mega-site and 3 other Montana sites.

The RPM is the key EPA employee responsible for ensuring that contaminated sites are properly investigated, appropriate remedies are selected, clean ups are conducted and the long-term protectiveness of the remedy is ensured. RPMs are the most visible government presence in the impacted communities. They manage multi-discipline, cross-regional teams to accomplish this critical mission.

1. There are 22 RPMs in the Denver office managing 69 Superfund sites (3.1 sites/RPM).
2. Of the 22 RPMs 4 are entirely consumed by the Libby Asbestos site. This means the remaining 18 each manage on average 3.8 sites. This ratio has been going in the wrong direction for at least 5 years.
3. The RPM workload has been growing in recent years due to:
    a. New NPL listings and new non-NPL sites with significant resource responsibilities (e.g. Colorado Smelter, Columbia Falls Aluminum, Upper Animas).
    b. New requirements coming out of the national Community Engagement Initiative and various critical IG reports on community outreach.
    c. The next generation of Superfund contracts (RAF) are enormously more work intensive for RPMs (task order administration and construction field oversight).
    d. Maintaining the accuracy of websites and other social media along with new national requirements require a major ongoing effort.
    e. The increased focus on the post construction phase and new problems at old sites mean that sites we thought were "done" are reemerging and requiring greater time and attention (e.g. Eagle Mine, Lowry Landfill, Chemical Sales, Lincoln Park, Uravan).
    f. Ensuring long-term protection through institutional controls and O&M along with working with communities on re-use and redevelopment of cleaned up sites is very time consuming and continues well beyond construction completion.
4. Succession Planning/Retirement Forecast
    a. SR has a very experienced staff. This is a strength but also a near-term problem in that we have been and will continue to suffer attrition via the retirements of our most experienced and productive RPMs
    b. Currently 5 of the 22 RPMs are fully eligible to retire. At this time15 are now eligible for Early Out. Within the next 4 years half will be fully eligible to retire. While hard to predict, we project several more retirements within the next 18 to 24 months.
    c. Training a new RPM is a long process. It typically takes 3 to 4 years for a new RPM to

learn the job and be ready to take on a complex site. Hence the need to hire a new RPM at this time in order to learn from the senior RPMs and begin the process of acquiring the skills needed to be successful in this complex, challenging and highly demanding position.

Alignment with Region 8 Priority Focus Area Framework

Collaboration at the community level (Superfund is inherently local). Complex environmental issues in communities disproportionately affected by environmental stressors (applies to many, if not most, NPL sites). Maintain sufficient investment of personnel for programs not delegated (Superfund is non-delegable).

Efficiencies Already Examined

Work at lower priority sites with no immediate threat to public health has already been postponed or delayed. Further disinvestments would create unmanageable vulnerabilities.

Overall Impact/Vulnerabilities If Not Filled

Superfund is not delegable to a State. Once a site is placed on the NPL or becomes a CERCLA site through an enforcement order, there is an expectation in the community and with the state that work will proceed apace. Here are some of the spillover affects of the current excessive workload in SR:

1. RPMs are tasked beyond reason and the workload continues to grow.
2. RPMs manage multi-million dollar contracts and there are significant vulnerabilities that result from inadequate time to review SOWs, contract deliverables and contractor invoices.
3. RPMs are unable to coordinate adequately with state and other federal partners, local government, stakeholder groups and the community.
4. When projects slow down, the length of time between site listing and cleanup means that communities are potentially exposed to the risks associated with the site for a longer time.
5. Although the program isn't delegable, states are important partners. We have Cooperative Agreements and SSCs with states at sites through which we provide funding for their involvement. Overworked RPMs are unable to perform adequate review of these agreements.
6. One of the principal ways that the public learns about Superfund sites is through our site web pages. New national requirements for websites can not be met in a timely fashion by overtaxed RPMs.

National Program Manager Expectations

OSWER expects the regional program to meet all its targets (GPRA, ACS, SCAP) for remedial action completions, construction completions, environmental indicators (groundwater migration, human exposure, site-wide readiness for re-use), as well as myriad other milestones in the Superfund process.

Potential for Disinvestment

Superfund is non-delegable. There is no realistic opportunity to divest beyond what has already been done by triaging some non-NPL and lower priority sites. The CERCLA statute obligates EPA to address the risk of exposures to the public and the environment. Even de-listed sites often require ongoing attention due to waste left in place and the five year review statutory requirement.

Skills Mix Needed

Environmental Engineer/Scientist. Ability to lead interdisciplinary teams. Ability to manage complex multi-year projects. Ability to oversee and direct contractors. Ability to effectively communicate effectively with a variety of colleagues, state partners, stakeholders and the public.